

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

MEREDITH CHADWICK RAY and)
PHILLIP RAY,)
Plaintiffs,) CASE NO: 3:07-cv-175
vs.)
FORD MOTOR COMPANY, et al.)
Defendants.)

UNOPPOSED MOTION TO CONTINUE

COME NOW the Plaintiffs in the above-referenced matter and file this Unopposed Motion to Continue. The Plaintiffs would show unto this Court a continuance is necessary and appropriate relief based upon the following:

1. This cause was initially filed on or about February 27, 2007.
2. On April 11, 2008, this Court issued a Uniform Scheduling Order establishing deadlines and setting this case for trial on April 6, 2009.
3. A trial date has been set for April 6, 2009.
4. The parties are working to set ten (10) key depositions. Further under the current scheduling order, Plaintiffs' expert disclosures are due on September 9, 2008 and Plaintiffs' Experts are to be deposed by October 9, 2008.
5. However, lead counsel for Plaintiffs will undergo surgery in Birmingham on September 4, 2008 which will require a week long hospital stay and a recovery period of at least six (6) weeks.

6. As a result, Plaintiffs' request a continuance of all deadlines in this case and the parties will submit an amended parties planning meeting with new dates.

7. Plaintiffs would show unto this Court that all parties are in agreement to the continuance under these circumstances.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request the Court to grant the Unopposed Motion to Continue and enter a new Uniform Scheduling Order reflecting a revised trial date and deadlines.

Respectfully submitted, this the **26th of August, 2008**.

/s/ D. Michael Andrews.
D. MICHAEL ANDREWS (AND076)
BENJAMIN E. BAKER, JR. (BAK025)
Attorneys for Plaintiffs

OF COUNSEL:

BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P. C.
Post Office Box 4160
Montgomery, Alabama 36103-4160
(334) 269-2343
(334) 954-7555 – facsimile
mike.andrews@beasleyallen.com

CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing document with the Clerk of Court using the CM/ECF system to the following CM/ECF participants:

Bradley J. McGiboney
D. Alan Thomas
Huie, Fernambucq & Stewart, LLP
Three Protective Center
2801 Highway 280 South, Suite 200
Birmingham, Alabama 35223
(205) 251-1193
(205) 251-1256 – Facsimile
bjm@hsllp.com
dat@hsfllp.com

Attorneys for Ford Motor Company

John C. Morrow
Geoffrey S. Bald
Burr & Forman LLP
420 North 20th Street, Suite 3400
Birmingham, Alabama 35203
(205) 251-3000
(205) 458-5100 – Facsimile
jmorrow@burr.com
gbald@burr.com

Attorneys for Pontiac Coil, Inc.

Robert H. Sprain, Jr.
Irene Elizabeth Blomenkamp
G. Allen Meighen, Jr.
Sprain & Meighen, P.C.
1707 29th Court South
Birmingham, Alabama 35209
(205) 437-3232
(205) 802-7083 – Facsimile
rhs@sprainlaw.com
ireneblomenkamp@aol.com

Attorneys for Visteon Corporation

Tabor R. Novak, Jr.
Gerald C. Swann, Jr.
Ball, Ball, Matthews & Novak, P.A.
2000 Interstate Park Drive, Suite 204
Post Office Box 2148
Montgomery, Alabama 36102-3148
(334) 387-7680
(334) 387-3222 – Facsimile
tnovak@ball-ball.com
gswann@ball-ball.com
Attorneys for Admiral Tool & Manufacturing
Company of Michigan

This **26th** day of **August, 2008**.

/s/ D. Michael Andrews
Of Counsel